

Dragon Products Timeline

Cathy Tarbuck (sp?) MEDEP Air – lead business/MEDEP contact

Other Facilities:

Concrete Plants

P.O. Box 119
Route 201
Fairfield, ME 04937

Bond Brook Road
P.O. Box 5309
Augusta, ME 04332

P.O. Box 671
Old Bath Road
Brunswick, ME 04011

960 Ocean Avenue
Portland, ME 04103

58 Main St.
Westbrook, ME 04092

12 Dragon Road
P.O. Box 658
Route 108
Canton, ME 04221

17 Cole Rd.
Biddeford, ME 04009

P.O. Box 300
Frechville Road
Frenchville, ME 04756

170 Parsons Road
Presque Isle, ME 04768

MSGP REQUIREMENTS:

Section K. Requirements to Maintain an Updated SWPPP

Part 2. An inspection determines the SWPPP is inadequate.

Part 4.a discharge authorized under the general permit that is determined by Department Notification to cause or have the reasonable potential to cause or contribute to the violation of an applicable water quality standard. SWPPP must document actions necessary to ensure future discharges don't do this...

1986 Jan 31 MEDEP reissues WDL #W-000801

~ EPA issues Dragon stormwater permit

1996 Nov 1 Letter (Paul Anderson) regarding impact of sanitary discharge on shellfish

1997 Nov 12 Facility (D. Bois) to MEDEP (P.Parker) describing process modifications

- 1997 Dec 11 MEDEP (P.Parker) retired Dragon Waste Discharge #W000801-57-D-R withdrew pending waste discharge license application #W000801-42-C-R.
- Asks for continued monitoring of Quarry #5 and SW
 - 1998 summary of # and quantity of years discharges
- 1997 Dec 12 Official WDL license closure letter from MEDEP (Dana Paul Murch)
- States that EPA will be asked to also close **NPDES permit ME#0000078)**
- 1998 Mar 31 Facility – discharge monitoring report submittal permit#ME0000078
Outfalls 001A – lagoon sanitary wastewater
Outfall 002A – Quarry #5 effluent
- 1998 Apr Facility receives Governors annual Waste Reduction Award – Poll Prvntn
- 2002 Apr 22 Facility Letter to MEDEP (P. Parker) – Plant Modernization and Water Management
- Ph Monitoring ‘periodically’ plus bi-annual water sampling
 - **Newly proposed ‘dry process’** uses less water but stil creates some process water – investigating potential uses
 - Chemical survey dry ore – discovered high sulphides
- 2005 Nov 14 MSGP SW coverage began – Sector E cement manufacturing
- 2008 Dec 16 NOV MEDEP docket no. MER200808
- discharging non-contact cooling water from Quarry #1 without obtaining a license
 - violations of Surface Waters Toxic Control Program 06-096 530(1)(b)
 - requires monthly log from Quarry 1 and Corrective Action Plan for ambient water remediation of metals
 - qrtly monitoring (Pb, Al, Cu) Outfalls #102/103/104
 - continuous pH, Temp, Cond monitor at Outfall #102
- 2008 Dec 31 Letter Facility to MEDEP – discharge monitoring log book started
Daily monitoring of ph/cond/temp from 102/103/104
- 2009 Jan 14 Meeting MEDEP / Dragon to discuss NOV
Additional analytical samples from Quarry #1
- 2009 Jan 21 Letter MEDEP to Facility requesting additional sampling
- 2009 Jan 29 Facility response to NOV (12/16/08) sent to (L.Lohn)
Calls discharge ‘deminimus’

2009 Feb 5 Began sampling Quarry #1 – weekly for 10 weeks through April 29, 2009

2009 Mar 13 Letter Facility to MEDEP (L.Lohn) unanticipated bypass report under MSGP

EPA COMMENT:

- Not fully 'unanticipated' since they had the kiln in-operational due to slow sales and therefore were trucking offsite the quarry water to the Verson Paper Mill for treatment. It was more likely a mis-calculation of storage capacity necessary from water balancing models.
- Why would they create a barrier to prevent further bypass with bags of cement! This would create worsened water quality...
- Kiln uses between 90-110K gallons/day – but after the event they were pumping at 130K to 'relieve the volume' should have been pumping at this rate with the knowledge of build-up from no recycling and spring freshet

2009 Mar 20 NOV MEDEP

- 3325 glns leachate discharged to quarry #1
- March 2, 2009 unknown quantity leachate ph 11.16 to wetlands that drain to outfall #3

2009 May 27 NOV MEDEP (Haz Waste) (A. Dumont) #03-30-2009-001

- Permanently cease unlicensed discharges from waste clinker leachate collection pond to water of the state;
- References Mar 2 and March 12, 2009 'unanticipated bypasses'

2009 May 27 Samples submitted to MEDEP [– see enforcement file binder clip]

2009 Jun 19 Facility response letter to NOV (haz waste May 27)
Clay cap to cover interceptor trench – 'Shot Rock Capping Prjt'

2010 Feb MEDEP Memo to Facility Ph, cond., and T at SG-1/2/3

- Reinstitute weekly leachate monitoring in trench piezos
- All leachate, sw and groundwater monitored after every 1"
- Evaluate the influence of Quarry #1 dewatering on CKD interceptor trench

2010 Feb XX MEDEP Drafts but NEVER SENDS enforcement letter concerning
DRAFT ONLY unlicensed discharge from Quarry #1
GOOD REFERENCES TO ALL VIOLATIONS

2011 Jan 6 Letter w/ Sample results Facility (Michael Martunas) to MEDEP
(G.Wood) (– See chem. Sheet in excel for more details)

- Samples 4/20/10 – Ar, Total Solids
- Samples 11/16/10 – Zn, Total Solids

- Facility in 2009 found 6 elements of Reportable Limits (RL)

EPA COMMENT:

- The risk associated with the fact that arsenic, as reported in Ayuso et al., USGS, is found in water wells at anomalously high concentrations due to natural bedrock and soil concentrations does not correlate to surface mining operations where ore and waste rock are exposed to natural weathering processes including stormwater runoff and oxidation.
- The study quoted from Reeves et al. describes the uptake of leached metals through sorption into secondary iron oxy-hydroxide minerals. This is not an argument that attempts to minimize the impact of mine drainage, but on the other hand it demonstrates the fact that heavy metals do migrate from mine sites in the area.
- What upstream sampling sites (ie. of waters that flow through the same geologic regime) have been monitored to be able to make the comparison that Quarry #1 discharge concentrations are 'naturally occurring'?

- 2011 Jan 6 Letter Facility (M.Martunas) to MEDEP (G.Wood) supplemental information for the Characterization of Quarry #1 Discharge
Cites geo papers stating that heavy metals are naturally occurring
- 2012 02 29 EPA meets with MEDEP (J.Glowa) collects hard copy file
- Is told that MEDEP decided in ~1990 that no license would be issued and therefore has not taken action.
 - MEDEP also afraid that if they permit this facility, they would need to permit all other mineral extraction industries similar to this.
- 2012 Feb 6 EPA file review at MEDEP
- 2012 Mar 21 EPA inspection
- 2012 3 30 Facility submits the 2008-2010 annual water quality reports

Effective Date of Water Quality Standards October 9th, 2005
Authority in Maine: 38 MRSA Sections 341-D 420

Q: Does CP-1 represent what is sent to the pre-treatment to the WWTP or is it what is held in the pond which could potentially discharge?

- Lead values 10/7/09 and 8/4/10 exceed ccc WQ limits for freshwater

- 2012 A. Rosenberg presents case to Edie
 -recommends to walk the path of discharge from the truck wash
 water
- 2012 05 30 OES (A.Rosenberg) inspects facility and walks discharge path from truck
wash area.
 Could not access drainage path from the rt 1 culvert.
- 2012 6 A. Rosenberg presents case to Ripanos Panel at EPA Region 1
- 2012 10 30 OES (A.Rosenberg) Scheduled third inspection to walk N.Easter drainage
path to old outfall 001.

